Thematic Summary of Comments

Integrated Pest Management Act Regulations: Discussion Document

Prepared for:
Environmental Management Branch
Ministry of Water, Land and Air Protection

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Table of Contents

Section A: Introduction and Background to the Consultation Process, and Description of the Responses Received 1

Introduction and Background to the Consultation Process 1
Description of Responses Received 1

Section B: Comments on Discussion Issues 3

Discussion Issue 1: *Process for Ministry consultation and notification regarding amendment of the Regulations* 3

Discussion Issue 2: *Pesticide categories and the list of "Exempted" pesticides* 5

Discussion Issue 3: *Establishing requirements for pesticide uses under Pest Management Plans, licence standards or permits* 8
Discussion Issue 3.a: Permit requirements for pesticide uses of high concern 8
Discussion Issue 3.b: Licence standards to replace endorsements 9
Discussion Issue 3.c: Pest Management Plans 10

Discussion Issue 4: *Establishing fair and appropriate fee schedules for service and vendor licences, permit applications and pesticide use notices* 11
Discussion Issue 4.a: Pest control service licences 11
Discussion Issue 4.b: Pesticide vendor licences 12
Discussion Issue 4.c: Pesticide permit applications 13
Discussion Issue 4.d: Pesticide use notices 13

Discussion Issue 5: *Determining the role and qualifications of Qualified Monitors* 14

Discussion Issue 6: *Defining notification requirements for pesticide use in or around office and multiple residence buildings* 18

Discussion Issue 7: *Establishing standards for the preparation of Pest Management Plans and pesticide use for major industry sectors – consultation and notification requirements* 20
Discussion Issue 7.a: Consultation requirements for preparation of PMPs 20
Discussion Issue 7.b: Public notification of pesticide use 23

Additional Comments 25

Section C: Vendor Comments Concerning Dispenser Requirements 29

Discussion Questions: *Dispenser Requirements* 30

Appendix 1: Acronyms and Abbreviations 32

105-03720/

Section A: Introduction and Background to the Consultation Process, and Description of the Responses Received

Introduction and Background to the Consultation Process

This report provides a thematic summary of comments received as part of the consultation process for proposed amendments to pesticide legislation for British Columbia. The summary has been prepared for the Ministry of Water, Land and Air Protection (MWLAP) by C. Rankin & Associates. This summary does not reflect the Ministry's position on any issue. It provides a synopsis of the types of responses that will be considered by the Ministry in the development of proposed regulations. This summary follows the discussion issue headings and questions contained in the discussion document prepared by the Ministry.

The *Integrated Pest Management (IPM) Act* was passed in the BC Legislature and received Royal Assent in October, 2003. This *Act* will replace the *Pesticide Control Act*, introduced in 1977. The *Integrated Pest Management Act* regulates the sale, use and handling of pesticides in British Columbia. The new *Act* enables IPM to be required for pesticide use on all public land, and on private land used for forestry, utilities, transportation and pipelines. The new *Act* will also complement provisions established under the federal *Pest Control Products Act*. The primary goals for the new *Act* are to:

- Establish regulatory requirements based on degree of risk to human health and the environment;
- Promote environmental stewardship and integrated pest management; and
- Set clear and enforceable regulatory requirements.

Before the new *Act* can be implemented, it requires accompanying detailed Regulations.

A discussion document and related information was posted on the Ministry web site for public review and comment from November 2003 to January 15th 2004. The discussion document provided a brief description of the consultation process leading to, and key provisions of, the *Integrated Pest Management Act*; outlined the process and provides consultation opportunities for development of the Regulations that will accompany the new *Act*; described issues and questions for public comment regarding the new Regulations; and provided a response form for those wishing to make comment. A supplemental questionnaire for vendor licensees concerning dispenser requirements was distributed to all current licensees in the province.

All comments submitted though this process, through independent submissions and through direct consultations with stakeholders will be carefully considered in the development of proposed regulations. Proposed regulations will be shared with the public via posting on the Ministry website to provide an opportunity for public comment.

The current timetable calls for changes to the Regulation to be submitted for Cabinet review in the fall of 2004. Further information concerning the review process can be obtained by following the links from the main Ministry web page, or at: http://wlapwww.gov.bc.ca/epd/epdpa/ipmp/pestact/index.html.

Description of Responses Received

Over 125 responses were received, including 17 written submissions with comments in addition to the discussion questions. Ten vendor licensees responded to the supplemental questionnaire concerning pesticide dispenser requirements. Close to 80% of those respondents who indicated an "area of interest"

were interested in or associated with pesticide vending or application – including about one-third in the forestry sector and 20% in landscaping (or golf courses). About 15% of the responses were involwed with local or provincial government agencies and about 5% in environmental non-government organizations. Many of the responses contained detailed suggestions regarding aspects of the proposed changes and/or specific suggested changes to the wording of IPM Regulations. All detailed comments have not been included in this document – but have been compiled as part of the comprehensive documentation of responses for review by the ministry.

Section B: Comments on Discussion Issues

Discussion Issue 1: *Process for Ministry consultation and notification regarding amendment of the Regulations*

The Ministry is planning to post information concerning content and administration of the Act and Regulations on a website, with a listing of amendments as they are made. A list service ("list serve") will also be maintained to notify all interested parties of any changes that are posted. The Ministry intends to consult on changes to the Act's Regulations. Suggestions were sought on effective means of consultation, given limits to Ministry staff and resources.

Question 1.1: *Do you consider posting of information on the Ministry's IPM website and notification through a regularly maintained list service ("list serve") as an effective means of communicating proposed and enacted IPM Regulations to interested parties? Do you have any comments or suggestions regarding such a service?*

Over 80% of those responding to this question viewed website posting and e-mail distribution of information as an effective means of communicating information to interested parties. Respondents provided numerous suggestions to the Ministry on improving the effectiveness of any such communications – and many respondents also noted that alternative methods of communicating with key interested parties and the broader public (such as direct mailings and newspapers) are still needed.

Respondents welcomed communications methods that would support dissemination of timely and consistent information concerning Ministry intentions and actions. Many respondents advocated a regularly scheduled quarterly update, with suggestions such as "include two categories… proposed changes and approved changes, in the regulations and standards" and "provide means for two-way communication." Several respondents commented that the Ministry's website could be "better organized… more accessible… (or) more user friendly." Several advised that the site "must be kept up to date with non-partisan factual information." It was also suggested that it should be a requirement of service licence holders to consult the website on a regular basis. Respondents also suggested that web-based means could be used to allow electronic submission of "PMPs, Section 7 Notices, Notifications of Intent to Treat (NITs), Annual Pesticide Follow-up reports, Service Licence Applications and so on…"

While some respondents suggesting using the list serve "as a discussion forum" others expressed concern that it not be used "as a promotion for the Ministry" or as a venue for "emotional responses from people who are fundamentally and ideologically opposed to the use of pesticides." Additional comments concerning the "list serve" included:

- "First, ensure that all interested parties are aware of this service…needs to be responsive to website users and include all interested parties;"
- "Ensure that the service is kept updated…working and accessible…make sure all documents and proposals are posted;"
- "List serve is not sufficient as a stand alone notification and e-mails should be sent to inform [for example] PMP holders…of the significance of amendments and regulation changes;" and
- "List serve should contain all licence and permit holders and all municipal managers…[and] water purveyors."

A number of respondents noted specifically that the Ministry should ensure that First Nations receive information and opportunity for comment – and that a website and list serve may not be the preferred means of communication for some First Nations. It was also noted that, for example, "almost 50% of woodlot licensees to not have access to the Internet or computers" and alternate means of communication are essential for such interests. Mail was suggested by one or more respondents as the preferred means of communication of key information for "instructors of pesticide courses…licensed companies…[and/or] pesticide vendors." Suggested means of communicating with the public included "local advertisements, through interest groups (BC environmental and wildlife groups) and through municipalities and regional districts." Other respondents commented that: "a broad discussion concerning general concepts serves no useful purpose without proper context."

Question 1.2: *Do you have any suggestions that would support effective consultation for future proposed changes to the IPM Regulations?*

Respondents provided many positive comments for consideration by the Ministry. A common suggestion was for the Ministry to hold regular annual meetings, on a regional basis, with PMP holders and other key interested parties to discuss regulations and regional experiences. Several respondents also recommended that the Ministry of Forests (MoF) should be involved in these meetings (to "reduce mixed messages to individual PMP holders from the Ministries"). It was suggested that the Ministry continue to use the services of the Integrated Pest Management Committee (which replaces the BC pesticide Control Committee) to advise the Administrator on future changes. Many respondents recommended use of "more localized" meetings or forums, including "focus groups… community based open houses… involvement of grassroots groups working on a reduction of the cosmetic use of pesticides…[such as] CPR! (Campaign for Pesticide Reduction!)… industry associations… [or] existing organizations."

Several respondents recommended establishment of a formal review and comment process for major amendments to the Regulations and that a major amendment be defined "as one that could have a material effect on public health and safety, or undermine the effectiveness in controlling pests or vegetation."

Many respondents provided specific advice with respect to consultations with First Nations – for example: "First Nations should have a separate consultation regime for major amendments to the Regulations or Standards. Because the consultation process needs to be flexible enough to accommodate the unique circumstances facing each First Nation and the current uncertainty in the law surrounding consultation with First Nations, we recommend that the requirements for consultation not be specified by the Ministry."

Several respondents suggested that particular effort be made to communicate with groups that may not have had in-depth involvement with the Ministry in the past, such as: "people in areas of agriculture [that may be] affected by drift… municipalities… [and] lawn care professionals."

Discussion Issue 2: *Pesticide categories and the list of "Exempted" pesticides*

The *IPM Act* and Regulations establish classes of pesticides, and requirements for licences, certificates, permits and pesticide use notices for each class. The Ministry proposes to retain the existing classes of the Pesticide Control Act Regulation, but to adjust the pesticides assigned to some classes. Adjustment to the list of Exempted pesticides would change regulatory requirements for individual pesticides. For example, Exempted products are not subject to licensing, certification or permit requirements. The Ministry is identifying pesticides for the schedule of Exempted pesticides in the new Regulations. It is expected that ongoing updates to the Exempt list of products will be necessary. Proposed changes with a rationale would be posted for comment prior to adoption. Comments or suggestions were sought on the categories of pesticides and types of pesticide use that should be in the Exempt category.

Question 2.1: *Do you have comments regarding the categories of pesticides?*

Note: many respondents also provided comments or suggestions regarding Exempted products under this question (as well as under Question 2.2).

Almost all respondents who commented on this question encouraged the Ministry to move towards harmonization of the provincial and federal pesticide classification systems. Several respondents noted that as the federal government (through the PMRA) is currently working on replacing the federal classification system, the Ministry's classifications should be "fully consistent with any new system the federal government creates." Many respondents, however, recommended inclusion of a "sub-category of 'commercial-light' (or 'commercial-unlimited') to cover specific, low-risk applications of glyphosate for forestry environments." Some respondents also suggested that triclopyr be included in this additional category. Others recommended that: "glyphosate and triclopyr should be in the Exempt category due to their low toxicity."

Some respondents commented that "Commercial and Domestic class products should be treated consistently…[with] categories determined on a consistent, risk oriented, scientific basis." The "free" use of glyphosate in a residential or agricultural setting, and around parks and golf courses – outside of the regulatory ambit of the IPM Act and Regulations – was seen by some respondents as inconsistent with the proposed "onerous…requirements for forest owners…[to prepare] a PMP, consult with neighbours and other stakeholders and [comply with] regulatory standards to protect streams." Other respondents commented on the extensive use of glyphosate for forestry applications – for example: "used so much that it almost needs its own category."

Specific comments and suggestions included:

- "Add Corn Gluten meal to exempted list, as long at the exempted list gives organic lawn care access to the tools which are our 'alternatives';"
- "It is not appropriate to take all surfactants out of the exempt list;"
- "The tone seems to support the incorrect supposition that 'natural' is safer. There are many 'natural' products that are very toxic. The federal government should control this aspect and the provincial government should control the sale and application only;"
- "BC is the only province in Canada that requires PCP# as part of [the] report process on [annual] sales…a list of up to date #'s [should be] posted on your site;"
- "The schedule of 'Exempted' products is being turned to more regularly by all pesticide user

sectors…the province should put resources towards defining the type of products that would be included in this section and then update it regularly;"

- "What is a 'reasonable adverse effect'? Define it!;"
- "There are a number of grey areas… where does slug bait (Metaldhyde) fit?;"
- "Certified applicators should be allowed to use rodenticides and insect baits and growth regulators without evacuation of a premise and without posting of notices;"
- "The Permit Restricted category should not be limited to federal pesticides which contain a permit requirement. BC should be proactive in identifying and phasing out pesticides that are unnecessary (where less harmful alternatives exist) or which pose an unreasonable human or environmental risk;" and
- "MSDS should be used to determine whether or not pesticides are exempt. Active ingredients are not always the most toxic or the most environmentally harmful ingredients in pesticides."

Question 2.2: ***Do you have comments or suggestions concerning pesticides or types of pesticide use that should or should not be in the Exempt category? What are your criteria for suggesting this (or these) pesticide(s) or use(s)?***

Several respondents provided suggestions regarding the process for adding or removing products from the Exempt category. One, for example, recommended that the Ministry "allocate the resources to hire consultants with this type of expertise, work with the PMRA and come up with clear criteria based upon scientific principles about what constitutes an 'Exempted' product." Another respondent suggested using PMRA or US EPA designations "Reduced Risk" or "BioPesticide" as criteria for inclusion in the Exempt category. Some commented that there should be provisions for frequent (e.g., annual) review of the list of Exempted products. It was noted by several respondents that product safety may be a factor of application method (e.g., tree injection products that involve limited human contact and have lower environmental impact could be considered for the Exempted category). Acute and Chronic LD50 values were suggested as a means for categorizing pesticides. A number of respondents commented that sale of combined weed control and fertilizer (e.g., "Weed and Feed") products should not be permitted.

The following products and/or uses were supported or recommended for inclusion in the Exempt category by one or more respondents:

- Glyphosate – either in entirety – or when applied according to the label and by selective means;
- Plantskydd deer repellent (in the soluble powder formulation – PCP#27411) and other organic based products;
- Corn gluten meal (i.e., "TurfMaize");
- *Bacillus thuringiensis kurstaki* (btk);
- Surfactants (as "their use is adequately controlled bye virtue of the pesticides that they are used with") "unless the surfactant poses a greater risk than the pesticide is being used with";
- Crack and crevice spot treatments (where pesticide use is confined to small areas where they cannot be accessed by people);
- Any commercially used product that is less than 1% in dilution in application or finished product (e.g., 1% permethrin or 1% bendiocarb);
- Commercially labelled insect bait stations;

- Drione (silica gel and synergized pyrethrins);
- Commercial Methoprene (Precor) (flea treatment);
- Boron based products with a "Commercial" label (e.g., copper boron rods – "Cobra Rods");
- Wood preservative bandage products cobra wrap (copper napthenate) and Cop-R-Plastic (copper napthenate and sodium fluoride);
- Ferrous sulphate (for moss control);
- Spinosad (a "reduced risk insect control product… on the Quebec exemption list");
- Dormant spraying mineral oil and lime sulphur;
- "Wood preservatives used on wood structures owned by company or person responsible for application";
- *Chondrostereum purpureum* fungus (for control of deciduous tree species);
- *Hyphaloma* fungi (for armillaria treatments);
- Fatty acids used for commercial application; and
- Soaps, such as "Safer products."

The following products and/or uses were recommended for removal from the Exempt category by one or more respondents:

- Lindane (product used for treatment of head lice);
- Diazinon ("should not be sold in areas where it will be mixed with chlorinated water");
- Rotenone ("much more toxic than mixed Killex [which is non-Exempt]"); and
- "So-called 'Non-traditional' pesticides (still have potential for harm due to misuse so all commercial applications of such products should require training and certification)."

Discussion Issue 3: *Establishing requirements for pesticide uses under Pest Management Plans, licence standards or permits*

The new *Act* moves away from a "permit and approval-based" regulatory approach but retains authority for the Minister to require permits for specific pesticide uses of high concern. The Ministry is proposing a defined list of pesticide uses of high concern that would require a permit. Also under the new Regulations, the Ministry is proposing institution of licence standards specific to landscaping and structural pesticide use on public land. The new *Act* also envisages the use of Pest Management Plans (PMPs) and associated pesticide use notices as a primary tool for Integrated Pest Management on extensive land areas such as rights-of-way and working forests. A PMP and pesticide use notice would be required for pesticide use on public land or private land used for forestry, transportation or public utilities (except for the few situations where a pesticide use permit or licence was required). Comments were sought on these aspects of licensing and permitting for consideration in *IPM Act* Regulations.

Discussion Issue 3.a: *Permit requirements for pesticide uses of high concern*

Question 3.1: *Do you have any comments or suggestions regarding the proposed pesticide uses that would require a permit?*

Most respondents who commented on this question expressed "general agreement" with the proposed pesticide uses that would require a permit. Some felt that they could not comment in detail until they had the opportunity to review the standards that are being proposed by the Ministry. Several respondents commented that permits should be required for pesticide application to playgrounds, schools, hospitals, parks, "large scale (whole apartment building, say more than 20 units)" or "large areas (anywhere that is a concern of harming the ecosystem)."

Many respondents made specific comments about five common aspects of the discussion issue:

1. *Special Use Permits for research activities* – with recommendations that the Ministry not discourage the "testing [of] new products and techniques that will increase the efficacy and reduce the environmental impact of vegetation management programs" through prohibitively high Special Use Permit fees or a cumbersome process for testing new products for registration;
2. *"Small-scale research" activities* – with many respondents requesting "no-hassle permits" for trials and research activities where a PMP is not needed, and pointing out that federal regulations enable spraying of 10 ha or less of unregistered pesticides for research purposes;
3. *Provisions for small operators/licensees* – with some respondents proposing a "graduated system" where lowest volume treatments might require "only the issuance of an approval from a regionally employed government representative…(similar to the MoF issuance of a 242 form)" and others suggesting that small operators (e.g., woodlot operations) should have the option to apply for a PMP, pesticide use permit or other form of permit;
4. *Definitions and regulatory provisions* – respondents requested consistency with federal definitions and policy and requested clear definitions for such terms as "areas of high concern, residential areas and limits of municipal influence;" and
5. *Use of pesticides for which no standards have been set* – respondents expressed concern that the proposal could hinder adoption of new products due to bureaucratic delays and/or limited government resources and suggested various alternatives, including: "a simplified application process, adoption of NPMA Good Practices Statements and/or referring to label directions to determine application standards."

Discussion Issue 3.b: *Licence standards to replace endorsements*

Question 3.2: *Do you have any comments or suggestions regarding the use of licence standards to replace endorsements for treatments of structural and landscape pests and other small-scale treatments?*

Respondents expressed wide support for this approach, commenting, for example, that "standards are more appropriate for accountability – [they] can provide a reference point to assure that all applicators follow the rules – we wish the standards to be realistic and broad to accommodate the wide parameters encountered in the field." Several respondents advised that all stakeholders, including provincial and regional environmental groups of interest, must be involved in determining standards – and that "standards, once developed, must be clearly stated and published." A number of respondents felt that it was not possible to make objective comments on the proposed direction without having the opportunity to review the proposed licence standards.

Divergent comments were received regarding the annual treated area that was proposed to determine applicability of this provision. Some respondents felt that "20 ha is a huge area, particularly in an urban setting, and should be reduced," others suggested that "this be for areas of 50 ha or a bit less, as an area of 20 hectares is too small." One respondent recommended "that the annual treatment restriction be increased from <1 ha to <5 ha for research trials and <20 ha for woodlots and small private forest companies," another expressed concern that the provision could provide a "loophole left for the forest industry to suddenly be claiming [that] landscape use for tree farms is fine…even an area as small as 1 ha can have devastating impacts to fish bearing streams depending on the chemical and the ground." One respondent cautioned against using area treated as the determining measure for scale of impact, as "often the best measure of a treatment is…some other quantity such as number of units…[e.g.,] rates based on form of treatment – spot or broadcast."

Question 3.3: *Do you have any recommendations or comments regarding the process to develop licence standards for structural and landscape pesticide use?*

Respondents provided numerous suggestions for the process to develop licence standards, commonly aimed towards ensuring "a transparent development process and clearly reported result. Comments included:

- "Interested stakeholders, municipalities, health groups and organic farming associations must all be directly involved in a meaningful way;"
- "Include the end users, as well as the scientists that develop the pesticides - workshops involving experienced applicators could be used to ensure clarity of objectives and requirements;"
- "Establish a permanent committee of structural industry and government representatives to consider practical, as well as technical, issues…government representatives should include Environmental Health Officers;" and
- "Assure good faith by answering communications in a timely manner and being transparent as to the positions of the various stakeholders, use scientific information to act upon concerns based upon the benefits, as well as the risks, of applying control measures, and [ensure] that industry representatives are included in formulating standards."

Discussion Issue 3.c: *Pest Management Plans*

Question 3.4: *Do you have any comments or suggestions regarding pesticide uses that would require a* Pest Management Plan (PMP) and pesticide use notice*?*

Many respondents were uncertain regarding the intent of the Ministry with respect to the proposed process for preparing and registering Pest Management Plans in relation to pesticide use notices – and requested "clarification on the intent…of providing a notice to the Administrator." Several recommended using the term "Integrated Pest Management Plan (IPMP)" rather than PMP. Many respondents also suggested that "simplified templates be available to operators/licensees to facilitate administration and implementation, and to provide a streamlined approach to pest management and silviculture – this template could be further refined at the local level to address regional-specific issues." Respondents also recommended that requirements for the content of pesticide use notices that are submitted to the Administrator be limited to "high-level information," such as: company name, general location and timing of treatments, active ingredients to be used, treatment types (application methods), PMP #, and contact particulars. Many also supported use of electronic means for submission of pesticide use notices. Respondents also expressed a common concern that lack of specificity in the discussion document statement: "proponents… [will] subsequently receive confirmation of receipt of the notice by the Administrator" leaves the possibility of open-ended bureaucratic delays. Respondents most commonly recommended that a 14-day limit be set for the Ministry to confirm receipt or request additional information. Some respondents also expressed concern regarding the role and authority of the "Regional Administrator" in that it "undermines certainty and is inconsistent with the development of provincial, scientifically based standards."

One respondent expressed concern about the proposed PMP process: "having the forest companies police themselves amounts to allowing them the freedom to do what they want and when they want since there will be no one to see and no one to stop any illegal activity…the forestry sector have been notoriously bad at following the advice of any other Ministry or stakeholder…the multi-year aspect of the PMPs will allow this to continue indefinitely and will probably set precedent for a new 'standard operating procedure.'"

One response included a statement of concern regarding the implications of requiring a PMP for private forest land, as well as for Crown land: "it is totally inappropriate for the regulations under the IPM Act to simply apply the same process [for both]…policies developed under the IPM Act and regulations must be fully consistent with other regulations and government policies that respect private property rights by having a clear distinction between requirements on Crown land and requirements on private Managed Forest land." The respondent suggested that "private Managed Forest landowners be regulated under the IPM Act regulations…under Bill 88 and the Private Land Forest Practices Regulation." Another respondent suggested that the IPM regulation requirements should be consistent with the Woodlot Licence Planning and Practices Regulation (WLPPR) to avoid duplication of existing planning processes.

Discussion Issue 4: *Establishing fair and appropriate fee schedules for service and vendor licences, permit applications and pesticide use notices*

The discussion document set out the following principles that the Ministry intends to use in setting fair and appropriate fees:

- Fees should fairly reflect the nature of the activity and types of services being regulated;
- Fees should ensure an appropriate return to government for the costs of managing the IPM program;
- The fee and IPM regulatory system should encourage the use of Integrated Pest Management principles, with the overall aim of reducing the impact of pesticides in British Columbia; and
- Fees should be applied on an equitable basis throughout the province.

Comments were sought on setting fair and appropriate fee schedules for pest control service licences, pesticide vendor licences, pesticide permit applications, and Pesticide use notices (associated with Pest Management Plans).

Discussion Issue 4.a: *Pest control service licences*

Question 4.1: *What do you feel would be* fair and appropriate categories *for the pest control service licence fee schedule, based on the size of the operation being licenced [to determine small, medium and large sizes of business]? Do you have any additional comments?*

Respondents who commented on this question suggested a variety of criteria that could (or should) be used to fairly distinguish between small, medium and large sized businesses. Respondents recommending numbers of applicators as a criterion, commonly suggested that >10 or >15 applicators could be considered a large business. Other respondents suggested using person-days of pesticide application per year as a more appropriate criterion (with >200 or >300 days per year suggested as a large business). Respondents also suggested amount of pesticide used (kg of a.i.), degree of public exposure and use of commercial and restricted category pesticides as criteria for establishing service licence categories. Several respondents commented that the fee schedule should provide incentives for good practice (e.g., "companies who use friendly products…[or] who employ people to hand pick weeds near residential housing"). One respondent suggested a lower fees "when the company or applicator signs an agreement to hire a spotter for environmental protection."

Many respondents provided extensive comments concerning the proposed principles for establishing the fee schedule and expressed concern that proposed categories are unnecessarily complex and could lead to perverse consequences (e.g., inconsistent reporting, "part-time less-experienced operators"). Many suggested that: "there should be one fee, priced on a cost-recovery basis…that reflects the cost of issuing the licence [and not the cost of servicing the IPM program]." Several respondents felt that the Ministry should be encouraging specialization (companies that work full-time in IPM and applying pesticides), "as it increases the level of expertise and professionalism." Others expressed concern that the proposed fee schedule may drive smaller operators out of the business and "in the end, large operators will monopolize the business, providing a non-competitive, high-priced market." Many respondents also felt that the Ministry should be encouraging all applicators in the province to be certified.

Many respondents commented that: "the proposed 900% increase in fees indicated by the discussion document is excessive."

Question 4.2: Do you feel that the term of a pest control service licence should be:

- one year;
- two years;
- three years; or
- optional: (one, two or three years)?

What are the reasons for your choice?

Over three-quarters of those who responded to this question felt that the term should be three-years or optional (i.e., "flexible"). Many respondents felt that a five-year term should be available – providing flexibility, efficiency and consistency with the term of PMPs. "Less red tape and administration cost" was of primary concern for almost all respondents who commented. Several respondents suggested a five-year licence fee of $1000 – as "this system rewards people or companies for staying in business and becoming experienced." Some suggested a shorter term (i.e., one-year) licence for first-time or inexperienced applicators – with longer terms available once the applicator has established a "track record."

Discussion Issue 4.b: *Pesticide vendor licences*

Question 4.3: *Do you have any comments or suggestions for establishing a fair and appropriate* schedule of fees for pesticide vendor licences*?*

Respondents commonly felt that the present system (a flat fee applicable to the vendor licence) should be maintained – with "licences kept simple…fees not used as an obstacle to market access…and the cost of the fee represent[ing] the average agency cost for issuing the licence." Several respondents commented that the fees should be low enough to encourage vendors in small towns (so that domestic pesticide availability is not restricted to large volume vendors and commercial users). One respondent encouraged the Ministry to "take a harmonized approach with other provinces such as Alberta, Quebec and Ontario." Several suggested that fees for vendor licences (as well as other provisions in the Regulations) should encourage dispensers' efforts to promote IPM and provide advice to consumers on alternatives to pesticide use, risks and appropriate application procedures if pesticides are used – "vendors should be paid to deliver the best possible information, this would be an incentive to educate…the vendor is the best link to the purchaser and end use – this is the key to safety."

Question 4.4: Do you feel that the term of a* term of a pesticide vendor licence *should be:

- one year;
- two years;
- three years; or
- optional: (one, two or three years)?

What are the reasons for your choice?

About 70% of the respondents who commented on this question felt that the term should be three-years or optional. Many suggested that the term should be up to five-years, others commented that the term should be directly related to "the experience and performance of the licensee." Respondents also recommended that licence provisions should reduce administrative costs for both proponents and agencies – e.g., "licences should be kept simple and fees should not be used an obstacle to market access or entry." Some respondents noted that the provisions and term of the licence should "allow for and facilitate the collection and analysis of sales or use data – as it will help measure the success of the program."

Discussion Issue 4.c: *Pesticide permit applications*

Question 4.5: *Do you have any comments or suggestions for establishing a fair and appropriate* schedule of fees for pesticide permit applications*?*

Many respondents commented that the suggested fee of $1000 was "excessive" and not reflective of likely administrative processing costs. A commonly expressed concern was that the proposed fee for Special Use Permits would discourage testing of "new and improved products" or "small adaptive management experimentations [that] could ultimately improve knowledge and refine application methods." Several respondents felt that the current fee (of $125/year) "is fair and appropriate."

Discussion Issue 4.d: *Pesticide use notices*

Question 4.6: *Do you have any suggestions for appropriate* criteria to define small, medium and large operations, *in order to set fees for pesticide use notices (associated with PMPs? Do you have any additional comments?*

Most respondents who commented on this question felt that total hectares over which treatment is to occur could provide a criterion to establish size of business but respondents varied in their suggested categories – from 50-600 ha for "small" and 200-2000 ha for "large." Several recommended that fees should be based on weight of product used – "to encourage use of alternative methods [of IPM]."

Many respondents felt that the proposed fees are excessive or that there should be no charge as "the Ministry has no discretion in approving a notice and, thus, the costs of responding with a confirmation of receipt letter is minimal." One respondent noted that: "as a principle, fees should not be used to fund compliance and enforcement activities." Respondents urged: "consistency between Ministries (MoF and MWLAP)...to audit/implement different regulations" and "streamlin[ing] costs with one fee for every aspect of IPM." A number of respondents felt that "the proposed fees are equivalent to an additional tax on forest owners [of private lands] that is not being applied equally to other landowners who use more pesticide, on a more frequent basis" or that "taxes and stumpage fees" should account for different silvicultural practices and costs of PMP management and implementation by the Ministry.

Discussion Issue 5: *Determining the role and qualifications of Qualified Monitors*

The new *Act* contains provisions enabling "Qualified Monitors [with] prescribed qualifications" to undertake specified services pertaining to the management and regulation of pesticide use. The qualifications and specified activities for Qualified Monitors will be set out in the *Act's* Regulations. The Ministry is proposing three distinct areas of activity, with associated suggested qualifications, for Qualified Monitors: development of PMPs; pretreatment assessment of treatment areas; and compliance assessment and reporting. Comments were sought on the proposed roles and appropriate qualifications for Qualified Monitors.

The Ministry is proposing that the Qualified Monitor could be a person who is an employee of the PMP holder with sufficient qualifications to perform the specified activities. It is not the Ministry's intention that Qualified Monitors always be third party persons but the comments received appeared to assume the Ministry wanted only third party persons.

Question 5.1: *Do you have any comments regarding the* proposed roles for Qualified Monitors*?*

i) Monitoring for IPM and development of PMPs

Almost all respondents expressed "strong" or "fundamental" opposition to the use of third party qualified monitors – feeling that PMP holders and applicators are "already self-monitoring" and/or that the monitoring and auditing role is the responsibility of MWLAP (and "should be paid for by the agency responsible for compliance and enforcement"). Respondents recommended replacing "monitoring with [an] auditing regime where you can demonstrate due diligence…consistent with other results based initiatives/processes." Respondents also questioned: "how the requirement for monitors applies to the structural industry" and "why should a licensee have to pay to be monitored?" "In the lawn care industry this could be one gigantic headache – I hope this is only for large public areas."

Many respondents pointed out that the "proposed roles of Qualified Monitors are those that operational foresters, technicians and workers have been doing for years" and that, if implemented, the designation should include persons who are Registered Professional Foresters, Registered Forest Technicians and other members of self-governing professions. Respondents felt that the initiative represents "an expansion of MWLAP jurisdiction and influence into Forest Management without the consideration of other tenure holder issues with respect to Forest Stewardship and Management." "Let industry run it's programs and use independent third party audits to see that programs are being developed and run properly."

ii) Pre-treatment assessment of treatment areas

Many respondents reiterated their "absolute opposition to…the proposed outside monitor requirements for monitoring for IPM and development of PMPs and pre-treatment assessment of treatment areas." Respondents felt that a QM would not be required as the "licensee has already assessed the area…if MWLAP want to look at the area prior to treatment [e.g., in the event of suspected mismanagement] then it would be an audit." "Requiring Qualified Monitors for monitoring IPM and developing PMPs is unnecessarily 'process oriented', leads to higher costs and will not improve proponent performance."

Some respondents felt that certified surveyor and/or RPF or RPBio visits to a site could be required for

forestry application, and many stated that this function is already a responsibility of licensees under PMPs and other planning requirements – "there is no need for a third party 'Qualified Monitor' to check pre-treatment assessments unless the proponent has has a significant non-compliance in the last 12-15 months." Respondents commonly stated that the approach contained in the regulation should be "results based…it should be up to the proponent to ensure that the more complex and sensitive areas are visited by a person(s) with appropriate qualifications for the issue(s) at hand…the proponent should be responsible and accountable for the results."

A segment of the respondents did express support for the concept – and put forward several suggestions for appropriate qualifications and tasks, e.g.,: "the Ministry could work with the Association of BC Forestry Professionals to have vegetation management work defined as forestry work…a Qualified Monitor should be someone with more than five years experience and a certified pesticide applicator in that category…previously, I have seen this type of assessment done in the office, or completed by a quick aerial overview – I do not believe that this is sufficient to identify sensitive habitats (nests, browse, dens, species at risk use, game trails, fish habitat, etc.) – these features require ground-truthing…ensure that they have both a comprehensive understanding of pesticide application as well as field experience in administering a variety of projects."

iii) Compliance assessment and reporting

While many respondents continued to express concern about the concept of Qualified Monitors, there was significantly more acknowledgement among respondents that the function of compliance assessment and reporting is needed to ensure accountability and public acceptance of the IPM program under the new IPM Act. It was commonly suggested, however, that this should be a role for the Ministry and not paid for directly by proponents. "The public and First Nations will have more confidence in the process governing pesticide use if Ministry employees are deployed in the field to assess and audit compliance."

Several respondents commented that proponents "have the staff and expertise to develop their own PMPs and the imposition of a Qualified Monitor into this process simply leads to increased costs and delays " Many expressed concern that the wording used in the discussion document ("any person believed to have misused pesticides may be required to obtain, at their expense, the services of a Qualified Monitor…") may leave proponents open to malicious or vexatious allegations, delays and expense – "there should be reasonable evidence of possible non-compliance." Several commented that a monitor should only be required where there has been a past case of poor performance. With respect to penalties, several respondents suggested that: "non-compliance issues should be handled in the courts – [and] less significant infractions…handled with a letter or small ticket of warning." It was also suggested that: "the new Regulation should be very 'specific and restrictive' with respect to the Administrator's powers."

Respondents suggested that duties, responsibilities and powers of monitors be clearly defined in the standards, with powers limited to monitoring specific and measurable thresholds or requirements in the PMP – and "the cost only placed on the plan holder if non-compliance is found." One respondent commented also that "an 'Inspector' with far greater administrative powers [than those proposed for a Qualified Monitor] can be any government representative with absolutely no qualifications or experience in the use of pesticides."

Some respondents expressed agreement with the proposed role and suggested specific or additional tasks for Qualified Monitors under this function: "in addition, monitors should be involved in updating users on regulations…as well, the monitor must regularly evaluate not only the operator but the success of the program – comparison studies must be undertaken to evaluate alternative methods…set a defined percentage [of activities or area treated for] compliance check – that should not be exceeded unless warranted." Proposed suggestions for "third party" monitors or auditors included the Forest Practices

Board, or third-party auditors required for ISO 14001, CSA or other certification. One respondent recommended a "public database for tracking community health issues [as is the case in] California."

Several respondents commented on qualifications under this question: "qualifications are too broad, being a certified applicator is necessary, two year of combined experience/education in the appropriate pest management field is not adequate…someone with more than five years experience as a certified pesticide applicator in that category (or technical school or university education in that field and a certified pesticide application holder)…person should have work experience under a qualified person and/or a training course in the specific category they will be monitoring and assessing for a minimum of 25 hours of actual application and/or attending a workshop or course designed for and covering all aspects of the specific application type is suggested (like the applicator workshop contracted and administered by the Ministry of Forests for forestry applications since 1992)."

Question 5.2: Do you have any comments or recommendations regarding the qualifications that should be required of Qualified Monitors*?*

Notwithstanding concern regarding the appropriateness of the roles for Qualified Monitors proposed by the Ministry, many respondents provided recommendations concerning required qualifications for QMs. Respondents commonly recommended a combination of field experience (with applicator certification) and education (related to the type of pesticide use involved in either a technical or professional field). Many specific (and sometimes differing) suggestions were made, including, for example:

- "Registered Professional Foresters, Registered Forest Technologists, and other members of self-governing professions should qualify…[these groups are] governed by a professional code of conduct that requires them to practice only in areas where their training and experience make them qualified;"
- "It may not be necessary for a professional to conduct all work (i.e., field work to identify sensitive areas in a proposed treatment area) but the work should be signed off by a professional when it is completed – all areas (i, ii, iii) require professional expertise and should require professional sign-off;"
- "We believe that technical schools and universities should both be recognised as post-secondary training…we don't believe that it is necessary for these individuals to be members of professional associations;"
- "We do not understand how the requirements for monitors applies to the structural industry – monitors could be useful in assuring that a chemical for which there is no standard is used appropriately – wherever monitors are used, we ask that a monitor be neutral (i.e., not a competitor), and experienced in the particular area of structural pest management that is being monitored;"
- "To be a qualified monitor in the forest industry the most important criteria has to be experience…has to be hands on and peer reviewed (endorsed by other qualified or experienced people)...suggest a minimum of five-years hands on experience and the endorsement of one professional and the regional administrator;"
- "Any person under the supervision of a registered professional in an applied field (RPF, RPBio, RFT)…this person should also have a few years experience applying pesticides;"
- "Should be a person who has the proven knowledge and experience to perform the specific duty in the PMP process – there are people with basic high school or post-secondary education (technical schools) but have on-the-job training and experience to properly conduct a job in specific area;"
- "An ecologist – not an industry person;"
- "Scientists and environmentalists who are affiliated with neither government or industry should

evaluate and monitor any program;"

- "Two years related education plus two years practical experience…[with provision] for less qualified persons to carry out [section ii)] work under the direct supervision of a Qualified Monitor (this would allow our present practice of allowing summer students or recent grads to carry out pre-treatment assessments);"
- "We suggest that the Qualified Monitors should, at minimum, be Qualified Environmental Professionals and that the expectations of such professionals in each role be set out very clearly in the regulations…we do not have confidence that the certified applicators as currently trained have sufficient training in integrated pest management or any legal incentive or legal requirement to promote such goals…we also feel that there should be very clear requirements for training in ecological and health impacts – this is the underlying purpose of the Act …[that all types of pesticide use] 'not cause an unreasonable adverse [environmental or health] effect;"
- "MWLAP will need to maintain/publish a list of those qualified – so that an applicant does not end up using someone who is not authorised to conduct inspections/audits;"
- "There should be a training program established to qualify monitors as monitoring needs to be carries our in a consistent way across the province – the training needs to include the proper way of collecting a variety of samples (soil, water & plants) assessing drift, identifying species at risk or sensitive habitats, handling samples to maintain integrity, and writing non-biased reports…requiring monitors to have a pesticide applicator certificate is worthwhile, but is far from adequate as the program does not provide enough background or knowledge to develop or evaluate a comprehensive Pest Management Plan or provide clean-up and decontamination directions…BCMAFF in conjunction with the BC Ag Council has developed a training program for environmental farm planners – examining this program and the process used to develop it could provide insight for a qualified monitor program;"
- "Highly experienced and educated – minimum 15 years experience if they expect to get any respect from visited site managers – [proposed] qualifications are too low;"
- "It should be incumbent upon the provincial government to assist in or provide this training to enable the various user groups affected by this legislation to meet the required qualifications – monitors should be trained in at least one of the following areas: entomology, plant pathology or vegetative management – training should entail field experience in the pest recognition and ID, biology, population dynamics and elements that keep the pest in check such as natural predators, parasites, diseases, climatic factors, etc.;"
- "Monitors can be accredited on-site Turf Managers;"
- "Offer that same education to people that operate golf courses, parks, sports fields, agriculture, etc.;"
- "QM must be up to date with current regulations and protocols pertaining to areas in which he or she is monitoring;" and
- "For 'pretreatment assessment of treatment areas' – recognized (post-secondary) training regarding the ecology of the biota and/or sufficient training to identify environmental risks of using pesticides in a proposed treatment area – if a person has had sufficient training to identify environmental risks of using pesticides in a proposed treatment area, then post-secondary training may not be required – a silviculture surveyor (sufficiently trained) who has previous [experience] should suffice."

Discussion Issue 6: *Defining notification requirements for pesticide use in or around office and multiple residence buildings*

The Ministry is proposing that the Act's Regulations include a requirement that use of non-Exempt pesticides in a living area by someone other than the resident of that living area, or in common areas, must be by a certified applicator. The Ministry also is proposing public notification requirements regarding pesticide use in or around commonly accessed office and multiple residence buildings for inclusion in the Regulations. Comments were sought regarding applicator certification and notification requirements (including appropriate requirements for use of Exempted products).

Question 6.1: What comments or suggestions do you have regarding* applicator certification and appropriate notification requirements for pesticide use in or around office and multiple residence buildings with common access areas*?

Most respondents who commented on this question supported current and proposed notification requirements and many provided specific additional direction. Suggestions included:

- "Notify owners, notify users, post all entrances and exits 24 hours in advance of application;"
- "Notification should be as direct and personal as reasonably possible;"
- "Notification must remain on every door in a building with the date of application clearly visible – I have on several occasions posted notices only to have building management remove them prior to or just after treatment because they did not want to alarm people or publicly acknowledge a pest problem;"
- "Notification is not sufficient if all that a directly affected tenant can do on receiving notice is to evict themselves from the apartment…the protection available to the tenant should be at least equivalent to that available to workers asked to work with pesticides or other toxins under WCB OH&S Regulations…section 5.7 allows workers to demand that their employer, if practical, replace chemicals that are known carcinogens, have reproductive effects, or have other toxic effects…tenants should be able to demand less toxic pest treatment in their homes;"
- "Municipalities could be involved in informing owners and managers of multiple residence buildings about the regulatory requirements;"
- "The current Licence terms and conditions in the Lower Mainland pilot project appear to be workable – we are concerned that some of our customers may go to non-certified companies when faced with extra costs associated with preliminary assessments and posting of notices;"
- "There should be some allowance made to waive this [notification] requirement for insects that pose a danger to workers or to children (e.g., wasps in offices or in or around schools);"
- "[Consider reviewing the] provincial training program – have a look at the Alberta model for ideas – endorsement of training centres and academic institutions to complete training courses and offer certification is a good concept;"
- "At unstaffed facilities in remote locations…with restricted access…we believe e-mail notification of staff members and direct communication with the managers is the most efficient and reliable option;" and
- "High traffic areas should be posted 24 hours before and 48 hours after application – applicators should require a minimum 85% on their applicator exam to qualify for this type of project." A number of respondents commented that notification requirements should: "depend on the type of pesticide used, the location of the application and the risk of exposure by people in the area" or that

the Ministry should: "take into consideration the relative toxicity of the mixed 'pesticide' to be used." Several respondents questioned the "scientific reasoning" for having lower standards in residential areas than on private forest land: "this proposal includes much-reduced notification and consultation requirements around people's homes and places of work, where a broader range of products, with higher toxicity will be used more often."

Question 6.2: Do you feel that it is appropriate to waive notification requirements for use of Exempted products *(those considered to be of low risk to human and environ-mental health)? Why or why not?*

Respondents were almost equally divided in opinion on this question. Those in favour of waving notification requirements for Exempted products pointed to their "low risk" to human and environmental health, the confusion and concern that might be raised by the posting of notices in such cases, the unnecessary additional administrative work and costs that would ensue, and the "trivialis[ation of] the real issues…by clogging up the process with low impact issues." Respondents who commented that notification requirements should be retained felt that people "want to know what is being used in and around where they live and work" and that some (e.g., the elderly, young or infirm…those who are chemically sensitive and have asthma) should be "given a choice to protect themselves." Some respondents suggested options for reducing notification requirements for Exempted products, such as informing residents of potential or planned application and providing them with an opportunity to indicate whether they want to be notified before their use. Respondents also suggested that notification (of use of Exempted products) could be used as a means of public education regarding IPM and the use of pesticides that minimize public health and environmental risks.

Discussion Issue 7: *Establishing standards for the preparation of Pest Management Plans and pesticide use for major industry sectors – consultation and notification requirements*

The preparation of Pest Management Plans for pesticide use will be expected to meet provincial standards set out in the new Regulations. The discussion document requested comments or suggestions regarding two specific issues concerning the standards – consultation and notification.

Discussion Issue 7.a: *Consultation requirements for preparation of PMPs*

Question 7.1: Do you have any comments or suggestions regarding appropriate and effective consultation requirements for proponents involved in preparing PMPs?

Respondents from the structural sector questioned Ministry intent with respect to PMPs for this sector: "it appears as if PMP consultation requirements do not apply to structural firms because we treat small areas…PMPs [are] just like using a sledge hammer to hit a fly, especially for a small operation in the structural pest control sector it's so big to mean nothing, yet you have to do it – why?"

A large number of respondents from the forestry sector pointed out that many forest licensees are required to prepare Sustainable Forest Management Plans (SFMPs), or Forest Stewardship Plans (FSPs), involving extensive consultations and suggested that proponents be given the option of including a PMP as a chapter in the forest management plan document rather being required to prepare a stand-alone plan. If the PMP is integrated with larger forest management plans, approval to use pesticides could be sought/given at pre-harvest stage. Respondents felt that combining PMP consultation with existing requirements and processes would reduce burdens for members of public, interest groups and licensees. Respondents were also concerned about "the finality of consultation requirements – once a PMP is developed and consultation is complete, the requirements cannot change during the life of the plan…it is not reasonable to require re-consultation when changes in local politics dictate."

Respondents commonly noted "two stages of consultation, one during PMP development and one during pesticide application" – with recommendations that "the general public should be consulted only during development of the PMP – treatments should require notification only…[and] consultation requirements should be limited to immediately impacted registered resource users." Several respondents also commented that: "consultation requirements [e.g., for woodlot licenses] should be at a scale that reflects the risk and extent to which pesticides will be used" or that "consultation effort and focus should reflect risk of harm." Respondents felt that, with respect to private forestland: "it is reasonable to notify neighbours…and others who are legitimately using areas within 200 metres of the proposed treatment areas."

Several respondents recommended distinct consultation and notification requirements for First Nations ("both for the development of PMPs and for the actual treatments") – "in accordance with provincial government policy…[and] with the necessary flexibility to meet the diverse needs of First Nations communities."

One respondent noted that the City of Kamloops has established a public IPM Consultative Committee and suggested that formation of similar committees could "be valuable to other users for providing input before PMPs are made open to the general public."

While many respondents recommended bounds on consultation requirements (e.g., "proponent should not be penalized if stakeholders do not provide meaningful, timely consultation"), others suggested comprehensive and specific requirements: (e.g., "the public must be thoroughly consulted – the proponent or applicant must directly contact every stakeholder group with an interest – this must include all local health, environmental, outdoor recreation and wildlife groups – notification must be published in local newspapers – websites are not adequate…proponents must consult with interested public and groups and must incorporate all justifiable input"). Respondents pointed to the importance of "both individual notice and an appropriately scaled PMP to allow real public consultation" (public newspaper advertisements and "specific notice for individuals holding property, licenses, permits or other rights which are in close proximity to the pesticide use"). Respondents also commented that "consultation implies a duty to accommodate as well as merely to listen and record – general requirements to use pesticides that provide the lowest likelihood of ecological or human health harm, and to examine non-chemical treatment should be explicit in the regulation."

One respondent suggested that the Regulation should include: "some specifics regarding 'minimum consultation'…[e.g.,] number of advertisements, where, minimum consultation required for First Nations, whether consulting with Band Councils alone is acceptable or if dealing with individuals is necessary." Another suggested that "at least two months should be allowed" for response to newspaper ads and that "in addition, proponents should be encouraged to use electronic-based approaches for viewing PMP and responses."

Question 7.2: Do you feel that it is appropriate to reduce consultation requirements on private land used for forestry, right-of-ways or public utilities*? If yes, what consultation requirements would you recommend? If no, why not?*

The question evoked strong responses both for and against reducing consultation requirements on private land used for forestry, right-of-ways or public utilities. Many respondents commented that private land should not be subject to such requirements: "consultation is not necessary…provided the owner is conducting a legitimate use of the land that does not infringe on the legal rights of others." Others felt that: "impacts on the environment and even human health are not confined to a single property – not only can pesticides move from their point of application, but the wildlife affected on one property is 'owned' by the province – they are precisely the type of public interest value that the Act is designed to protect."

Many respondents felt that: "the need for consultation should be based on the accessibility of the area to people (e.g., because the area is fenced, entry roads are gated or appropriate no-trespassing signs provided) and the impact of the treatment to people nearby rather than ownership." Several commented that: "the standards should adequately protect Crown resources and require communication and notification of neighbours who live (or have a domestic water intake or well) within 200 metres of a pesticide treatment area – persons who have permission to use land that is proposed for treatment or [are] within 200 metres of a treatment area should also be notified." Many also advocated consistent and "high" consultation requirements to: "establish and maintain a high standard of safe, quality work that is not harming resource values."

Suggestions differed with respect to consultation requirements for First Nations. One respondent commented that: "since the government is no longer approving a PMP the government has no fiduciary obligation to consult with First Nations – no attempt should be made to pass on a fiduciary obligation to consult with First Nations, that does not exist, to the private forestland owner." Another pointed to: "the Environmental Appeal Board (Timberwest vs. Cowichan Tribes) [decision that] has recently established that aboriginal rights of consultation do exist even on private forestland." One respondent advised that "in the railway context" there should be reduced consultation requirements, "however, where treatment is to take place on First Nation reserve lands, more specific notification should be required – First Nations

should be notified annually of proposed treatment including the locations, date and descript of treatments."

Question 7.3: Do you feel that it is appropriate to reduce* consultation requirements for situations where there is little public access or where treatment impacts are minimal*? If yes, how would you define such situations and what consultation requirements would you recommend? If no, why not? Do you have any additional comments or recommendations?

Most respondents felt that the level of consultation "should be based on the real potential for various parties to be exposed to the treatment…where there is little public access and minimal impacts the only requirement should be local notification at the planning stage and via signage during and after treatment."

The following common comment was received from many respondents: "the use of herbicides in forestry is of low impact and usually involves little if any exposure to the public. Consultation requirements and notification requirements should be limited to immediately impacted interest groups and resource users, as well as First Nations. Consultation requirements should not apply to the actual treatments. The extensive regulatory regime which governs the use of pesticides in the province adequately addresses public consultation requirements. Treatments should require notification only. First Nations should have a separate notification and consultation standard (which in part already exists). These standards need not be duplicated in the regulation and can be referred to in the standards. Consultation for First Nations should also be limited to local immediately impacted groups."

Suggestions for defining areas "where there is little public access" included: "remote areas at least 10 km a way from any human habitation…areas with no public roads…areas that can only be accessed by helicopter or boat…areas 5 km from a publicly maintained road…areas without vehicle access from a nearby town…[areas with] no access routes (road, trail, walkway) connected to a publicly accessible transportation network within 100 m of the proposed application." Several respondents suggested defining "minimal impacts" by listing treatments: "such as all herbicide single stem or spot treatments, broadcast applications with non-restricted pesticides of < 50 ha, etc…[or] ground application of glyphosate and triclopyr."

A number of the respondents expressed concern that the proposed policy "will create a strong disincentive for allowing recreation on private forest land and will not only spoil the enjoyment of private citizens but also harm businesses that benefit from private land recreational opportunities – to differentiate policy between landowners that allow others to use their property and landowners that don't is a disincentive to landowners for allowing all forms of access to private forest land." One respondent suggested that a "mail out to local clubs using the area (e.g., hiking club or cross country ski club with trails/tracks going through the treated area)," as well as notices posted at the entrance of any official trails, should be required. Another commented that: "Guide Outfitters and trappers (of which the majority are not local residents) have too large of an area of interest to actually be impacted by the forestry treatments [and should not] receive special treatment such as letters – they have the same ability to read the paper as the general public - if there is a vested interest in the area they will inquire and receive documented notices."

Respondents who did not favour any reduction in consultation requirements for such situations pointed out that: "public concerns regarding pesticide use go beyond personal safety." "The purpose of the Act is not only to protect human health, but to protect the environment more generally. Areas where there is little opportunity for access are precisely the areas with the greatest environmental benefits – as the ecological integrity of the area has not been jeopardized by excessive human access. To use pesticides lightly in such areas is not at all advisable and public involvement is entirely appropriate." Another respondent further commented that: "there are few areas of the province where there is no public access.

The immediate neighbouring occupiers are merely those most obviously present in the area. First Nations traditional use, wildcrafting, hunting, and other users could be put in use if the proponent was able to dispense with consultation based on his or her opinion that the area was not accessible. The term is vague and likely to be abused if adopted."

Additional comments made by respondents included:

- "Always give people who are affected the chance to offer an alternative to pesticide use;"
- "Sites which meet the criteria for [this discussion section] 7.3 should be available for treatment upon notification of MWLAP;"
- "An immediate treatment and follow up repeat treatment in a small area could eradicate whatever the pest problem quite quickly but if one has to follow all the rules [for preparation of PMPs and advance notification] each of those steps requires too much [t me] therefore the pest problem is enlarged to bigger areas [and results in] using more pesticide;"
- "All regulations should apply to all applications – no special requirements;" and
- "Current licensing of applicator must be up to date."

Discussion Issue 7.b: *Public notification of pesticide use*

Question 7.4: Do you have any comments or suggestions regarding appropriate and effective requirements for public notification of pesticide use under a PMP?

Most respondents supported the notification requirements outlined in the discussion document: "what the Ministry is proposing is basically what our members have already been doing for many years – we agree with requirements for appropriate signage, notification to registered land users only, and consultation during PMP development stage only – our members who work throughout BC in many sectors have found that this system works adequately."

Specific comments made by respondents included:

- "The term 'resource user' is too open-ended…we strongly recommend changing this to 'registered users' of the land;"
- "We recommend that notifications in the form of newspaper ads be restricted to The Province and the Vancouver Sun because it is not cost-effective or feasible to advertise in a large number of regional and community papers [for the power transmission utility corridor situation];"
- "Posting intentions on site well ahead of expected application is likely most effective but the necessity for such measures should reflect the inherent risk level of the specific chemical, application method, and treatment area size;"
- "The extent of the notification process should be at the discretion of the PMP holder and should not be prescribed in the Regulations or standards – suggestions can be made as to 'best practices' only…remain with the results based paradigm to allow licensees to carry out notification as they require;"
- "We…suggest that the Worker's Compensation Board Occupational Health and Safety Regulation (WCB OH&S Reg) provides a model, with its requirement that safety data be provided in addition to minimal information about where and what was treated. We approve of the use of all three notice requirements identified by the Discussion Paper. It would also be useful for the Ministry to compile

PMP notifications to allow a user to access all the areas of proposed and past pesticide use in their own vicinity from a central website;"

- "Again First Nations community members can access areas that would be considered remote by others on a regular basis. This would eliminate us from protection using the probability of bystanders exposure rule. We should be notified of any usage in our traditional territories so we can inform our membership of areas to avoid [in] harvest of animal and vegetable foodstuffs;"
- "The public is prohibited from accessing railway right-of-ways for safety reasons. Indeed, public access is illegal. Given that there is no public access to these locations, we believe that it is inconsistent to post signs regarding herbicide applications in these areas…in addition the Railways oppose the requirement of public notification of pesticide use (i.e., NITs and advertising) for railway applications. We note that this position is consistent with BC Rail's Pest Management Plan which has been recently approved;"
- "Specific notification of resource users could be quickly accomplished by a well-maintained list serve;"
- "Water purveyors must be contacted directly and given enough time to assess results and consider need for independent risk assessment – 30 days is not enough time;"
- "Do NOT group all types of pesticides here – take into consideration the 'danger' of the mixed product – low toxicity products greatly diluted should be treated much differently than highly toxic products that are not diluted;" and
- "The First Nation consultation process should be conducted by MWLAP."

Question 7.5: Should notification requirements be different for private land used for forestry, rights-of-way or public utilities? If yes, what notification requirements would you recommend? If no, why not?

Many respondents provided comments related to this question under earlier sections of the discussion document (e.g., see questions 7.2 and 7.3). Many repeated their assertion that private forest lands should not be subject to the same notification requirements as public lands, and any such requirements be related to the ability of the public to access the area and the nature of the treatment involved. Respondents commonly advised that notification in these situations should: "involve direct contact with neighbours within 200 metres of the proposed treatment areas and legitimate users of the property, [and providing] information detailing proposed treatment types, timing, duration, and contact details for further information [with] signage at access points to the treatment [to] compliment the direct communication." Other respondents felt that consistency is an important principle – and factors such as potential for public access and exposure, toxicity of products involved and treatment methods should be considered when determining notification requirements: "all land use areas should be treated equally…private lands and the possibility of contamination are no different from public lands and contamination."

Additional Comments

As well as commenting on specific discussion issues and questions, many respondents provided additional comments or recommendations. While many of the comments touch on issues raised in the discussion document, they are summarised in this section.

Several respondents who commented that the proposed increase in maximum penalties for offences under the Act (from $2,000 to $200,000) is "inappropriate" and/or "unjustified." Several respondents also expressed opposition to introduction of an "administrative penalty regime," citing experience under the Forest Practices Code of "uneven enforcement, frivolous administrative actions and increased cost to industry and government." Instead, these respondents felt that "serious violations of the Act should be dealt with by enforcement in the courts, not through an administrative penalty system…We are pleased [however] that the implementation of the administrative penalty system will not occur in the first release of the IPM Regulation."

Respondents requested a "better rationale for the suggested fees or fee increases," recommending, for example, the fee schedules should be based on the actual work done by the Minister/Administrator in providing the particular services to proponents…mere presentation of pesticide use notice to the Administrator should not command high fee." "Intentions may be good but consider the small business – landscapers, horticulturists and golf courses are the most highly educated people in those industries using pesticides – public education is the key to long term."

A number of respondents took issue with the implication in the discussion document that IPM reduces reliance on pesticides and should lead to an eventual reduction in their use: "encouragement to efficiently use the most appropriate silvicultural tool should be given – government should support use of pesticides where they are the most appropriate treatment method on the pest being managed." "IPM has always been the logical approach to pest management for homeowners and commercial operations. But for it to work, you have to convince people that not all pesticides are bad, and used properly, they are a cornerstone for IPM to work."

Other respondents expressed concern about current and future use of pesticides in the province – and the role of the provincial government in IPM and pesticide use: the bottom line is that pesticide use is often unnecessary, is poorly evaluated, is often counterproductive, and is potentially hazardous to human health and the environment. The province, as the manager of public lands, must take an active role to educate prospective pesticide users and proponents about the potential of and preference for alternative methods. The province must take responsibility to determine if, in fact, a problem actually exists and if it does, whether there are more effective and less potentially hazardous and damaging methods that should be employed. The province must ensure that the public is adequately informed and notified and consulted. People must have the opportunity to decide it they and their children and pets should be exposed to potentially toxic, mutenagenic and hazardous substances."

Sector or issue-specific comments are provided in the following paragraphs:

"The task of writing regulations which require the proponent to actually implement an IPM approach to pest management is by far the most difficult aspect of the Act. It is far easier to include requirements around procedures to be used or information included than to require a proponent to balance different treatment regimes in a manner that protects the public interest… While the details of implementation may vary as between sectors, the basic approach [to IPM] should remain constant and would have been appropriate to include in the Discussion Paper. We have suggested [in our response] above general requirements to use the least harmful alternatives. Other basic legal requirements should include taking

preventative measures to prevent the outbreak of pests in the first place and not engaging in industrial practices which encourage the spread of pests."

"When dealing with community watersheds, the purveyors must be given enough lead time to ensure that all of the necessary precautions are taken to protect water quality (e.g., research information and determine need for studies). There is a conflict with current regulations under Ministry of Health in that water purveyors are responsible to protect water quality but they don't have final decisions on PMPs…When dealing with water supplies on private lands, stakeholder committees should be set up to ensure all issues are covered and public interest and questions are addressed. Risk assessments on community watersheds should be carried out by independent monitors ahead of licence application, and stakeholders given enough time to review the results. The Licensee of the PMP permit should bear the responsibility and costs for conducting a monitoring program, independent studies and damages resulting from the application of pesticides."

"Organic lawn care companies don't and won't get [pesticide applicator] licences yet we really want to be able to offer our customers the alternatives to pesticides – the prime ones being acetic acid (Horticultural Vinegar used mostly on hardscapes as a weedkiller) and Corn Gluten Meal (a natural and safe pre-emergent herbicide applied in pellet form to lawns)…[if these products are added to the Exempt list and there are no posting requirements]…you will reduce dramatically the overall usage of pesticides and you will give a boost to those of us who have been waiting to be able to provide these proven, safe alternatives."

"It doesn't seem that changes to the Act will affect our golf course operation. I have subscribed to the information services and look forward to timely and pertinent bulletins." "I am currently the Provincial Director of the Canadian Golf Course Superintendents Association and I have served as President of the Western Canadian Turfgrass Association. I think the biggest problem I have seen in the ongoing pesticide debate is the lack of education and information [regarding] those that make the decisions on pesticide restrictions. Health Canada, the World Health Organisation and other peer reviewed organisations review all the products we use and they make the necessary recommendations on what is safe and what is not."

"Highly recommend [sending] this new legislation and proposed regulations to consumer groups (property management associations, nursing and care home associations, seniors facilities, hospital administrator's association, public parks and schools administrations) because they are the ultimate user groups [who will be] affected by inconvenience, [any] higher costs due to changes and in some cases they might end up with worse pest problems (…public health problem or insect-originated contamination of hospital equipment)."

"Many times the structural pest control industry has provided input to concerns and regulations from the Ministry. They have always listened to our concerns but in reality our input has not made any difference…in a nutshell our concerns over the new regulations seem that the true objective of the Ministry is to put pest control companies out of business – that is the general feeling that I get from people in the industry…hopefully we can work together in a true partnership to establish realistic goals and pertinent regulations."

Several respondents provided additional comments and suggestions regarding training, education and information:

- "Training for industry, consultants and government people involved in the development and administration of PMPs will be a key to the successful implementation of the new Act and Regulations. We support a joint training effort that involves the three parties in development, delivery and participation in the training;"

- "Consideration should be given to the formation of an accreditation system for recertification of the various applicator licenses. Credits could be awarded for BCSPMA membership and attendance at meetings and seminars…this would benefit all involved – from the public through [to] the entire industry;"
- "A yearly gathering of all licensed companies may bring out many interesting ideas – two years ago a forum was held at Malaspina College in Nanaimo…this type of get-together should be continued;"
- "The Federal website is poor and labels are not available. BC should make the labels available online. The most important thing to do now is to educate and remediate. People who are affected by pesticide use are often impaired in their ability to communicate;"
- "The efforts of the Ministry should be spent on public and business education in regards to pesticides and to work towards a zero policy on pesticide use;" and
- "The focus [of the discussion document] on high concern pesticide use, rather than 'typical' situations…is logical but relies on properly educated personnel in the use and handling of these products. Is there provision for promoting this education (e.g., website with Frequently Asked Questions, links to product and use information)?"

Additional comments included:

- "To avoid widespread conflict upon implementation of the PMPs in the Northern communities and First Nations you need to [consult directly with First Nations and communities] personally. The members I mention are not feeling included in the process, some First Nations are unaware of the impacts of the changes you intend to make. Spending the time now would allow concerns to be expressed by the First Nations government representatives themselves and not by consultants hired to be their voice;"
- "It should be mandatory for all food handling establishments to have some form of professional pest control in place…the same as food operators requiring a Food Safe certificate;"
- "To the best of our knowledge there has been little or no consultation with technical experts working for environmental non-governmental organisations. We would hope that the technical experts being consulted are government employees with the skills necessary to develop an IPM approach. However, based upon consultations in relation to other legislation, we fear that the technical experts being consulted are employed by the very industries who are to be regulated by the regulations, it is highly problematic if government comes to rely upon industry experts for more than basic input. These individuals, while undoubtedly qualified in their respective fields, are in an inherent conflict of interest and likely feel an obligation to their employer which supercedes their obligation to the public at large. We therefore call on the government to disclose what technical experts have been relied upon in each industrial sector, and what consultations with industry have occurred;"
- "I strongly disagree with you issuing a One Year Applicator Certificate when they have proved knowing just over half (60%) of the answers to your relatively simple exam – an applicator should receive a certificate only after passing with a minimum score of 75% (also as an applicator and license holder, I was disappointed to find out that I was not able to learn what answers I had answered incorrectly on my exams – would it not be in the best interest of everyone for an applicator to learn what he does not know?);"
- "It is unclear to me what happens in the transition with currently active PMPs. Who is drafting Regulations? Industry/operational people must be involved in this. The regulations and standards must be clear and operationally feasible (with large fines involved it is necessary that 'grey' areas be minimized;"

- "Working groups on a district level to adapt 'in the field' rules, must exist to improve the process and alleviate unnecessary struggles in this process. Most areas already have a group to deal with the issues that have arisen in the past. Variances from PMP are a section that requires looking at now. What will a person do if your plan indicates you shouldn't spray but the field application is rational and justifiable? …Can professional rationale be incorporated into the new legislation?;"
- "August 2003 edition of Scientific American article 'Secret Ingredients' which discusses the use of non-active ingredient carriers in pesticide formulations which need not be advertised by the manufacturer…has the Ministry considered this issue? …In the US, the EPA is requiring labelling that indicates when the carrier has a certain degree of toxicity;"
- "A report entitled 'Survey of Pesticide Use in British Columbia: 1999' was prepared by Enkon Environmental Limited on behalf of Environment Canada and MWLAP to contribute to the Georgia Basin Initiative…this study showed that the amount of pesticide active ingredient purchased in BC in 1999 was 8,102,384 kg. In 2003, the total level of active ingredients used by the Railways in British Columbia was 7,648 kg…[this] represents only 0.09% of the estimated pesticide use in the province;"
- "If the intention of the legislation is to make pest control expensive, complicated and the regulations almost impossible to interpret and discourage people to conduct pest control, then the new legislation has some aspect in it…I think that overall, the whole field of pest control has to be simplified with regulations that are concise, clear and in plain language;"
- "Government needs to be made aware of the costs to business of their actions through legislation. It can cost a licensee over $100,000 to prepare an approvable PMP. This is absolutely unacceptable. The concept of IPM includes a proactive response to pest problems. However, under the current PMP application process, it can take up to two years to get an approved PMP. This is an absolute contradiction to the whole IPM concept. In my opinion, the new Integrated Pest Management Act has done little more than just introduced another level of bureaucracy and added further cost to a waning forest industry;"
- "The new plans should be flexible enough to allow for multiple treatments on the same area over several years. Hybrid poplar management should also be classed as agriculture, so that the types of chemicals are not restricted solely to ones registered for forestry use;
- "Mandatory Doctor and nursing training in pesticide diagnosis for chronic and acute exposure, especially in agricultural areas;"
- "Other countries address spray drift in their legislation [in the proposed IPM Regulations] there is no mention of both spray and vapour – this is very backward… There must be a method derived whereby the confrontational attitude toward pesticide application is diffused. The government contributes to this attitude by distancing themselves from the actual process. By allowing the use of pesticides by untrained farmers and then making the farmer accept responsibility for adverse effects;"
- "I would like to urge the Ministry to establish a registry of cases where individuals have gotten sick from the application of pesticides;" and
- "In all situations, the municipal government should be notified if pesticide application is contemplated. Local government officials are the first called by citizens with concerns and therefore should be well informed."

Section C: Vendor Comments Concerning Dispenser Requirements

The existing Pesticide Control Act Regulations contain a requirement for Pesticide Vendors to ensure that every sale of a non-exempt pesticide involves a certified dispenser who must "confirm to the purchaser that the pesticide is suitable for its intended use." This means that for every sale, a certified dispenser must be present and must ask the customer what they will use the pesticide for. There is no specified requirement to provide information on the use of Integrated Pest Management or least toxic controls, although the certification materials include training on this. Consultations conducted in the fall of 2002 regarding provisions of the new Act indicated a strong support for retaining a requirement for certified dispensers to talk with potential purchasers of pesticides prior to sale. Respondents generally felt that conversations with trained dispensers are the most effective means of reducing inappropriate pesticide use by domestic users.

In proposing requirements for vendors under the new Regulations, the Ministry wishes to:

- Ensure that purchasers who request assistance can obtain information about IPM and the appropriate use of pesticides at the time of sale; and
- Recognize the potentially onerous obligations that vendors may face in having sufficient numbers of trained dispensers to speak to every purchaser, including those who do not want help.

The Ministry is proposing that Pesticide Vendors under the new Regulations be required to:

- Have at least one certified dispenser on site to:
  - assist with responses to in-store pesticide emergencies (e.g., spills), and
  - provide advice on principles of Integrated Pest Management, use of least toxic controls and safe application – if requested by a customer purchasing a pesticide;
- Post signs near pesticide displays to indicate that customers can obtain advice on principles of Integrated Pest Management, use of least toxic controls and safe application from the certified dispenser; and
- Ensure that all purchasers of non-exempted pesticides are informed at point of sale (by certified or non-certified staff) "that the pesticide use can only be for that use described on the label and that label directions must be followed."

These requirements will mean that at least one certified staff must be present at the vendor site when a vendor is selling pesticides, but that the certified dispenser is only required to provide advice to a customer upon request. This requirement ensures provision of accessible and relevant IPM information to potential domestic pesticide users who desire or require knowledgeable assistance. The need to follow label requirements can be indicated by non-certified sales or support staff.

A letter providing this information and including three targeted discussion questions was distributed to all, approximately 500 in total, licensed pesticide vendors in the province. Ten responses were received and are summarized in this section.

Discussion Questions: *Dispenser Requirements*

Question 1: Do you have any comments or suggestions regarding the proposed requirement that a certified dispenser be available at all times to assist in response to in-store pesticide emergencies and provide advice to customers about IPM principles, least toxic controls and safe application (if requested by a customer)?

Most respondents felt that a requirement to have a certified dispenser available to answer questions and respond to any storage or product "emergencies" is reasonable. Several raised a concern, however, that such a requirement is not reasonable for a small retailer where only the owner has a dispenser licence: "I would have to lock my doors to run out for an errand, take a day off of take a short holiday." One respondent noted that: "my pesticides are in a locked cabinet (all retailers should be forced to do that) – that way my part-time staff cannot sell the products when I am not available." Another recommended that: "all retailers keep [non-Exempt] pesticides behind a lock and key so that it is not possible for customers to pull things off the shelf and walk through the checkout without being forced to talk to the dispenser." Another felt that: "it should not be left up to the customer to request information – if a licensed dispenser is involved in the sale from the beginning the customer is going to be given the correct product and information, by having the dispenser ask all the appropriate questions."

Respondents expressed support for "necessary regulation that will actually reduce risk…[or] improve safety" but cautioned against regulations "that are only going to make regulators feel good" and "make it more difficult for small retailers to sell the product." One respondent suggested an alternative of setting up a 1-800 number for consumers to access with questions – "we would rather at the point of sale have the option of saying to the consumer, 'be sure to read the label and if you have any further questions please call this number' rather than your suggested alternative of having a staff member on site at all times who is 'the one with all the answers' – to us that is totally unrealistic, time consuming and costly."

Question 2: Do you have any comments or suggestions regarding the posting of signs near pesticide display areas to indicate that a certified dispenser is available to provide advice on the use of IPM, least toxic controls and safe application?

Respondents offered a number of specific suggestions or comments regarding appropriate signage, including:

- "CLEAN, SIMPLE, EASY TO READ & UNDERSTAND signage is necessary if we are not going to ask every purchaser about their intended use of the product;"
- "Integrated Pest Management and least toxic controls information [should] be available to us for display and to hand out to customers (we already prominently display other safety notifications on walls around the purchasing area);"
- "[Provide suggested] wording if we have to print the signs ourselves;"
- "Solve this problem by putting them all behind lock and key (with a sign if you want) – shelf, wall and other space is all very valuable in a small, highly seasonal business – I do not have the extra space for signs;"
- "What makes sense in our situation is to post a sign in our pesticide area indicating that IPM info is available and to make use of the IPM manual located there as well;"
- "Signs are a good idea but it should be a dispenser that completes the sale;"
- "Does this [requirement] include aerosols and ant baits (i.e., Exempt pesticides)?;" and

- "Signage is a good move – it would help retailers if customers learned to seek advice…if customers asked more often, [fewer] would end up at the cash register only to be held up because that have not spoken to an employee yet."

Question 3: Do you have any comments or suggestions about the proposed requirement that a licensee must ensure that any pesticide purchaser be informed at the point of sale (e.g., by sales clerk) that the pesticide can only be used for uses listed on the label, and that all label directions must be followed?

Generally, respondents felt that this requirement would be redundant or problematic in practice. Comments included:

- "We believe [this requirement] will just bring up questions that they [non-certified cashiers] will not be qualified to answer – this will slow down our cash lines and create scenarios where the cashier is put into a position of offering unqualified suggestions or faulty information;"
- "I understood that we were already required to speak to all customers and that my employees' most basic job is to ensure they [the customer] are only using it for the intended purpose;"
- "Redundant, if a certified dispenser has already talked to the customer;"
- "We could offer a business card size information sheet with general guidelines or information that they need to follow, with a sentence that states that is they need assistance, a certified person is available, or the cashier could just tell them that if they had any questions or concerns a certified person is available;"
- "It should be required that the customer is informed at the point of sale by the licensee, not just by a sales clerk. I feel that we as licensed dispensers should handle all aspects of the sale, isn't that why we became dispensers in the first place?;" and
- "We (the licensee store owners) would simply make it a store rule that these warnings be given to all customers by sales clerks when purchasing any non-Exempted pesticides…However, I liked the old way of the licensee selling the product going to the till to inform the sales clerk that all required info had been given. That way the customer is not reminded twice and he feels he has had good service from someone he knows is licenced to do that."

Additional Comments

Respondents provided a number of comments in addition to responses to specific questions, including:

- "[Warehousing facilities follow] the extensive protocol and audit required by the Agrichemical Warehousing Standards Association…I would suggest that we are the 'strongest' link in chemical safety handling concerns…we have greatly reduced the amount of chemicals carried by the end user [domestic retail outlets] …they use us a storage facility – this probably has reduced the use by some consumers and certainly has increased the safety of storage of chemicals in the area – we also will take triple rinsed empty containers back and recycle the containers at no charge to our customers;"
- A major problem with licensing is the lack of pesticide certification courses in some areas of the province. Individuals have only the option of taking the course by correspondence. This, combined with the high turnover in the retail industry, makes it extremely difficult to maintain trained staff…Years ago the Ministry of Environment had their staff provide certification courses in various locations (through the college). As a result, retailers were able to have a good number of employees trained. In many communities there are individuals trained to teach food safety, workplace safety, etc and I believe these individuals could probably add the pesticide course(s) to their training programs."

Appendix 1: Acronyms and Abbreviations

a.i.	active ingredient (of pesticide)
BC	British Columbia
BCSPMA	British Columbia Structural pest Management Association
EAB	Environmental Appeal Board
EPA	(US) Environmental Protection Agency
FSP	Forest Stewardship Plan
ha	hectare
IPM	Integrated Pest Management
IPMC	(BC) Integrated Pest Management Committee (under the IPM Act – replaces the PCC and includes provincial and federal representatives)
kg	kilogram
LD50	Lethal Dose 50%
MAFF	Ministry of Food and Fisheries
MoF	Ministry of Forests
MWLAP	Ministry of Water, Land and Air Protection
MSDS	Material Safety Data Sheet
MSRM	Ministry of Sustainable Resource Management
NGOs	Non-Government Organizations
NIT	Notification of Intent to Treat
OH&S	Occupational Health & Safety (Regulations)
PCC	(BC) Pesticide Control Committee
PMP	Pest Management Plan
PMRA	Pesticide Management Regulatory Agency (Federal – Health Canada)
PUN	Pesticide Use Notice
PUP	Pesticide Use Permit
QM	Qualified Monitor
RFT	Registered Forest Technologist
RPBio	Registered Professional Biologist
RPF	Registered Professional Forester
SFMP	Sustainable Forest Management Plan
US	United States
WCB	Workers Compensation Board